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Attorneys for Plaintiff and the Proposed Class

**UNITED STATES DISTRICT COURT
 NORTHERN DISTRICT OF CALIFORNIA
 SAN FRANCISCO DIVISION**

CAE SOUND, on behalf of itself and
 others similarly situated,

Plaintiff,

v.

**Elna Co., Ltd.,
 Elna America Inc.,
 Hitachi Chemical Co., Ltd.,
 Hitachi Chemical Co. America, Ltd.,
 KEMET Corporation,
 KEMET Electronics Corporation,
 Matsuo Electric Co., Ltd.,
 NEC TOKIN Corporation,
 NEC TOKIN America Inc.,
 Nichicon Corporation,
 Nichicon America Corporation,
 Nippon Chemi-Con Corporation,
 United Chemi-Con, Inc.,
 Panasonic Corporation,
 Panasonic Corporation of North America,
 SANYO Electric Co., Ltd.,
 SANYO Electronic Device (U.S.A.)
 Corporation,
 Rubycon Corporation,
 Rubycon America Inc., and
 Toshin Kogyo Co., Ltd.**

Defendants.

Case No.: 14-cv-04677-LB

Master File No.: 14-cv-03264-JD

**DECLARATION OF STEVEN N.
 WILLIAMS IN SUPPORT OF
 ADMINISTRATIVE MOTION TO
 CONSIDER WHETHER CASES
 SHOULD BE RELATED PURSUANT
 TO CIVIL LOCAL RULE 3-12**

The Honorable James Donato

**DECLARATION OF STEVEN N. WILLIAMS IN SUPPORT OF ADMINISTRATIVE
 MOTION TO CONSIDER WHETHER CASES SHOULD BE RELATED PURSUANT TO
 CIVIL LOCAL RULE 3-12**

1 I Steven N. Williams, declare:

2 1. I am a principal at Cotchett, Pitre & McCarthy, LLP, and counsel for Plaintiff
3 CAE Sound in the above-captioned litigation. I am a member in good standing of the State Bar
4 of California and the Northern District of California. I have personal knowledge of the facts set
5 forth in this Declaration, and, if called as a witness, I could and would testify to them. I make
6 this declaration pursuant to 28 U.S.C. §1746.

7 2. I am over 21 years of age and am not a party to this action. I submit this
8 Declaration in support of Plaintiff CAE Sound's Administrative Motion to Consider Whether
9 Cases Should Be Related Pursuant to Civil Local Rule 3-12.

10 3. Attached hereto as Exhibit A is a true and correct copy of the Class Action
11 Complaint filed in *CAE Sound v. Elna Co., Ltd., et al.*, Case No. 14-cv-04677, filed on October
12 20, 2014 in the United States District Court, Northern District of California, currently pending
13 before the Honorable Laurel Beeler.

14 4. Defendants have not yet appeared in *CAE Sound v. Elna Co., Ltd., et al.*, Case
15 No. 14-cv-04677, and therefore, a stipulation could not be obtained.

16 I swear under the penalty of perjury, under the laws of the United States of America that
17 the foregoing is true and correct.

18 Executed this 21st day of October 2014 in Burlingame, California.

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20 /s/ Steven N. Williams
21 STEVEN N. WILLIAMS
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